Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems and Their	)	MM Docket No. 87-268
Impact Upon the Existing Television	)	
Broadcast Service	)	

To: The Commission

PETITION FOR PARTIAL RECONSIDERATION

Univision Communications Inc. ("Univision"), the ultimate parent of stations KFPH-DT, Flagstaff, Arizona; KUVI-DT, Bakersfield, California; WOTF-DT, Melbourne, Florida; KWEX-DT, San Antonio, Texas; KUTH, Provo, Utah; and WSUR-DT, Ponce, Puerto Rico (collectively the "Stations"), by its attorneys, hereby petitions the Commission for partial reconsideration of the *Seventh Report and Order*, FCC 07-138, adopted in the above-captioned docket.[1] In the *Seventh Report and Order*, the Commission adopted a modified post-transition digital television table of allotments ("DTV Table") and accompanying Appendix B. The limited purpose of this Petition is to request reconsideration of the Appendix B facilities for the Stations, all of which are returning to their analog channels for permanent DTV operations, as detailed in the attached Engineering Statement prepared by Karl Lahm, Engineering Manager for Univision Management Company.[2]

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[1] *Seventh Report and Order, In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, 2007 FCC LEXIS 5822 (rel. August 6, 2007) ("*Seventh Report and Order*").

[2] *See* Exhibit 1.

In response to the Commission's proposal to "freeze" for the duration stations' permanent DTV facilities to those parameters set forth in Appendix B, Univision's Comments on the Commission's *Notice of Proposed Rulemaking* in the *Third Periodic Review* discussed at length the fact that the proposed freeze would prevent many television stations that are returning to their analog channel for permanent DTV operations from using their existing analog antennas without substantial power reductions and corresponding loss of service to the public.[3] Specifically, by prohibiting applications which propose service outside a station's allotted DTV contour, such a freeze would force stations to either use their existing analog antenna at significantly reduced power (in order to stay within their DTV allotment contour), resulting in substantial loss of existing broadcast service, or instead expend scarce resources on the design, manufacture and installation of temporary "freeze-compliant" antennas meant to match the DTV table of allotments, but which could leave existing analog viewers without broadcast service in 2009.[4]

As Univision noted in its Comments, "[t]his is a perverse result, as the reduction in power serves only to withdraw an existing broadcast service from large numbers of viewers in February 2009, in violation of the Commission's decade-long quest for service replication."[5] To prevent this result, Univision urged the Commission not to impose such a freeze, but to instead provide stations with the flexibility necessary to continue serving their existing analog viewers while

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[3] *See* August 15, 2007 Comments of Univision Communications Inc. ("Univision Comments"), in response to the Commission's *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, 22 FCC Rcd 9478 (2007).

[4] Univision Comments at 13.

[5] *Id.* Univision also cited the many benefits for a station moving its permanent DTV operations to its analog channel and using its existing analog antenna and transmission line. These include avoiding the need for tower riggers, a reduction in the complexity of the work on the ground, and increasing the likelihood that the work can be done by station personnel rather than having to bring in outside installation specialists, who will be in short supply during the transition. *Id.* at 12.

minimizing the need for equipment and installation resources that will be in short supply in the time remaining before February 2009.[6]

While Univision continues to believe that permitting stations to apply for the facilities that are most suited to serve local viewers is the best approach to accomplishing the DTV transition (rather than require absolute adherence to the Appendix B allotment facilities), the Commission has not yet decided that issue. In the meantime, Univision understands that the Commission has indicated a willingness to at least partially address the need for flexibility by entertaining petitions for reconsideration of the DTV Table of Allotments where a station is returning to its analog channel for permanent DTV operations, and adhering strictly to the Appendix B facilities would adversely affect service to the public. As shown in the attached Engineering Statement, each of the Stations is returning to its analog channel for permanent DTV operations, and the operating parameters currently set forth in Appendix B would make it impossible for the Stations to avoid loss of service to existing viewers when the analog operation is replaced with the digital facilities set forth in the DTV Table of Allotments.[7]

For example, Univision station WOTF-TV in Melbourne, Florida was allotted its analog channel (Channel 43) for permanent DTV operation, and constructed its analog facilities on Channel 43 in a manner that will permit an easy conversion of the existing antenna and facilities to digital operation. However, if WOTF-TV is required to adhere to the parameters currently specified in the DTV Table, the station would have to construct entirely new DTV facilities at its former analog transmitter site, some 35 kilometers away. In addition to the unnecessary expense and drain on increasingly scarce antenna design, manufacturing, and installation resources,

[6] Univision Comments at 8-16.

[7] *See* Exhibit 1.

approximately 176,000 analog viewers would lose the station's programming in February 2009 under this scenario. Worse yet, if the station were to operate its DTV facilities from the existing analog antenna and merely reduce power to stay within the DTV Table contour, approximately 316,000 viewers would be deprived of service.[8]

In order to prevent such loss of broadcast service, Univision respectfully requests that the Commission partially reconsider its order and modify Appendix B of the DTV Table of Allotments to specify operating parameters that will permit the Stations to utilize their existing analog antennas at power levels intended to cover as closely as is practical the existing analog service area. The precise operating parameters for each of the Stations to accomplish this are set forth in the attached Engineering Statement.[9] As indicated in the Engineering Statement, these operating parameters will cause no impermissible interference to any other station. As a result, there is much benefit and no harm to adopting the revised parameters. By doing so, the Commission will greatly simplify the DTV transition for these Stations while allowing them to continue to serve their existing analog viewers after the transition to DTV has been completed. Univision therefore strongly urges the Commission to adopt these modifications in furtherance of the public interest.

CONCLUSION

In order to preserve broadcast service to hundreds of thousands of viewers, and to do so without causing harm to any other broadcast station, Univision respectfully requests that the Commission modify the Stations' operating parameters in the DTV Table to specify the

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[8] *See* Exhibit 1.

[9] *Id.*

parameters detailed in the attached Engineering Statement. Doing so will bring significant benefit to the public, while helping to simplify and expedite the DTV transition itself.

Respectfully submitted,

UNIVISION COMMUNICATIONS INC.

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Dated: October 26, 2007

EXHIBIT 1

ENGINEERING STATEMENT

Engineering Statement
in support of
Petition for Reconsideration
Univision Communications Inc.

In the Commission's Seventh Report and Order in MM Docket No. 87-268, *Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service* (7th R&O), digital television stations were assigned post-transition channels and facilities based on their elections during the FCC's channel selection process and the technical standards adopted by the Commisison for that purpose. In many cases, the FCC staff derived hypothetical antenna radiation patterns which were specified for post-transition use by these stations. Where stations will use their present analog channels for DTV transmission after the transition is concluded, the existing antennas used for analog broadcasting seldom match the patterns developed by the FCC staff for DTV transmission. In some cases, the FCC patterns cannot be realized due to technological limitations. In other cases, it is not practical to change antennas without seriously disrupting existing analog or digital service, due to tower aperture availability and/or structural capacity.

Of the 12 Univision Communications Inc.[1] stations moving to existing analog channels at the end of the DTV transition, five will move to an immediately adjacent channel and now have antennas in place which match the radiation pattern characteristics specified by the Commission staff. However, the remaining seven stations are not in this situation, with some unable to change antennas due to structural or aperture availability issues and others in different circumstances. This Engineering Statement supports a Petition for Reconsideration to change the facilities specifications of six of these stations to utilize their existing analog antennas.

A. KFPH-DT Flagstaff, AZ

KFPH-DT was assigned its elected channel 13, the present analog channel of KFPH-TV, at an effective radiated power (ERP) of 19.6 kilowatts (kW), antenna height above average terrain (HAAT) of 474 meters, and with a directional antenna described by FCC ID 74998.

[1] Univision Communications is the ultimate parent of the stations' licensees.

In certifying facilities for the purpose of the DTV channel election process, KFPH-TV specified the FCC's 1997 "replication" coverage. A hypothetical directional antenna, FCC pattern ID 74998, was derived by the FCC staff based on matching the high-VHF F{50,90} DTV coverage noise-limited coverage contour to the UHF F{50,90} coverage contour for the 1997 channel 27 allotment, which, in turn was generated by matching the UHF F{50,90} noise-limited contour to the high-VHF F{50,50} analog Grade B coverage contour. Due to differences between the F{50,50} and F{50,90} propagation curves and their characteristics on high-VHF and UHF channels, the derived directional characteristic assigned to KFPH-DT in the 7th R&O differs somewhat from that of the licensed KFPH-TV antenna.

The antenna support tower at Mormon Mountain is fully loaded, with neither structural capacity nor aperture available for the mounting of a new channel 13 antenna until the existing analog service is terminated. Were KFPH-DT to utilize the current KFPH-TV antenna but be constrained by the ERPs in specific directions that result from antenna ID 74998 (in order to maintain its coverage contour within the allotted bounds under the proposed "freeze" continuation[2]), the station would be limited to an ERP of 13.7 kW (a decrease of 30%). The allotted facilities and the proposals of the 07-91 NPRM leave the station with the choice of unnecessarily replacing a usable antenna, thereby increasing demands on scarce nationwide antenna design, manufacturing, and installation resources, or taking a significant reduction in ERP that will cause viewers loss of service after analog transmissions end.

By the instant Petition for Reconsideration, KFPH-DT seeks substitution of its licensed analog antenna, ID 18728, in lieu of the hypothetical antenna generated by the FCC staff, ID 74998.

A study by the consulting engineering firm of duTreil, Lundin, & Rackley, commissioned by Univision during the preparation of its comments in the 07-91 NPRM, established that operation of KFPH-DT on channel 13, at the allotted ERP and HAAT, but with antenna pattern ID 18728,

[2] See Notice of Proposed Rule Making. MM Docket No. 07-91, *Third Periodic Review of the Commission's Policies and Rules Affecting the Conversion to Digital Television* (07-91 NPRM), at 92

would not cause 0.1% or greater interference to any co-channel or adjacent channel facilities[3] as listed in the DTV Table of Allotments adopted and increases the area served by 1.6%.[4]

Accordingly, it can be concluded that substitution of the presently-licensed analog antenna for the hypothetical antenna generated by the FCC staff can be made without any adverse impact on any station and ensures that present KFPH-TV viewers will not lose service when post-transition DTV facilities are implemented.

B. KUVI-DT Bakersfield, CA

KUVI-DT was assigned its elected channel 45, the present analog channel of KUVI-TV, at an ERP of 210 kW, antenna HAAT of 387 meters, and with a directional antenna having FCC ID 74619.

In certifying facilities for the purpose of the DTV channel election process, KUVI-TV specified its now-licensed, "maximized" channel 55 DTV facility. The radiation characteristics set forth in FCC pattern ID 74619 matches that of the licensed KUVI-DT facility, FCC ID 29841. However, because the present DTV antenna is a slotted coaxial type that is not of broadband design, it cannot be used on channel 45. KUVI-DT must either utilize the existing KUVI-TV antenna, FCC pattern ID 17203, or have a new channel 45 antenna built to match the FCC hypothetical pattern, ID 74619.

Unfortunately, the antenna support tower lacks both the space and structural capacity to handle installation of a new antenna without disrupting existing operations. Were KUVI-DT to utilize the current KUVI-TV antenna but be constrained by the ERPs in specific directions that result from FCC pattern ID 74619 (in order to maintain its coverage contour within the allotted bounds under the proposed "freeze" continuation), the station would be limited to an ERP of only 40 kW (a decrease of 81%). The station appears to be faced with the choice of terminating or severely

[3] Specifically, stations KPNX-DT on channel 12 at Mesa, AZ and KTNV-DT on channel 13 at Las Vegas, NV.
[4] The study also showed a population 3% below that specified by the FCC in the DTV Table. Given that the contour distances with the analog antenna are not lower than those of derived from DTV Table operating parameters in any direction, an error exists in one or both of the population totals. This discrepancy will be resolved in a supplemental analysis.

reducing existing analog or digital service to install a new channel 45 antenna[5], or taking an extreme reduction in ERP that causes loss of service to thousands of viewers post-transition.

By the instant Petition for Reconsideration, KUVI-DT seeks substitution of its licensed analog antenna pattern, ID 17203, in lieu of that generated by the FCC staff, ID 74619, at ERP of 193 kW and HAAT of 404 m.[6]

A study by the consulting engineering firm of duTreil, Lundin, & Rackley, commissioned by Univision during the preparation of its comments in the 07-91 NPRM, established that operation of KUVI-DT on channel 45, at the allotted ERP (210 kW) and with the licensed analog antenna (HAAT 404 m, FCC pattern ID 17203), would not cause 0.1% or greater interference to any co-channel or adjacent channel facilities[7] as listed in the DTV Table of Allotments adopted, increases the area served by 3.0%, with a service population increase of only 1.9%. The slightly lower ERP requested herein would result in slightly smaller increases.

Accordingly, it can be concluded that substitution of the presently-licensed analog antenna, at the ERP specified, for the hypothetical antenna pattern generated by the FCC staff can be made without any adverse impact on any station and ensures that present KUVI-TV viewers will not lose service when post-transition DTV facilities are implemented.

C. WOTF-DT Melbourne, FL

WOTF-DT was assigned its elected channel 43, the present analog channel of WOTF-TV, at an ERP of 1000 kW, antenna HAAT of 300 meters, and with a directional antenna having FCC pattern ID 74433.

The old analog facilities that the DTV Table seeks to replicate no longer exist. They have since been replaced with an improved transmitter site, located near Bithlo, FL, 35 kilometers from the old site. The facilities described by the DTV Table are not at the transmitter site of WOTF-TV's

[5] Procurement of such an antenna will also increase demands on scarce nationwide antenna design, manufacturing, and installation resources.
[6] ERP was adjusted downward slightly from the DTV Table value due to the small increase of HAAT inherent in the existing antenna's elevation.
[7] Specifically, stations KHIZ-DT on channel 44 at Barstow, CA, KRCA on channel 45 at Riverside, CA, and KBCW-DT on channel 45 at San Francisco, CA.

licensed analog service and will not encompass the station's present analog coverage area.[8] This new analog facility was specifically constructed as a "convertible" installation, ready for rapid re-configuration to DTV service at the end of the digital transition, given that WOTF-DT will be returning to its analog channel and has always intended to use its existing analog antenna for its post-transition DTV facilities.

If WOTF-DT is required to commence post-transition operation using the facilities presently allotted, service will be lost to 316,012 people residing within an area of 4,428 square kilometers, as the signal contour for the facilities allotted to WOTF-DT falls significantly short of covering the existing analog service area. In addition, the station would need to fabricate and install a new antenna at its old analog site, adding unnecessary expense and placing increased demands on scarce nationwide antenna design, manufacturing, and installation resources.

Accordingly, WOTF-DT requests that the Commission allot it facilities based on its presently licensed analog service, which will allow the station to use its existing analog antenna and largely replicate its existing analog coverage area. **Specifically, WOTF-DT requests that the following parameters be used:**

ERP: 200 kW, HAAT: 492 m, Antenna ID: 66697
Site Coordinates: 28° 35' 12" N, 81° 04' 58" W

Figure 1 illustrates the present analog, DTV Table, and proposed DTV coverage areas.

A study by the consulting engineering firm of duTreil, Lundin, & Rackley, commissioned by Univision during the preparation of its comments in the 07-91 NPRM, established that operation of WOTF-DT on channel 43, at the now-licensed analog site, HAAT, and antenna pattern ID

[8] The Commission's process of certifying facilities for the purpose of the DTV channel election process limited WOTF-DT's choices to the 1997 "replication" facilities, its "maximization" construction permit granted in 2001, or its STA facilities operating in early November of 2004, all of which were located at the station's old analog transmitter site (St. Cloud). Implicit in the Commission's limitations was a presumption that analog facilities had not significantly changed since 1997 and would not be changed prior to the 2009 completion of the DTV transition.

At that time, however, WOTF-TV had a pending application for construction permit for a new analog facility at a different transmitter site, BPCT-20040524ADW, which was subsequently granted and licensed. It is this facility that is intended for the post-transition DTV operation of WOTF-DT, using the station's current analog channel and antenna. However, because the station was not permitted to certify in Form 381 to the use of its new site because (a) it was an analog, not digital, application, and (b) it had not yet been granted, the DTV Table facilities specify a coverage area based on the old transmitter site. The WOTF-DT facilities could not be relocated to this site because of a spacing/interference problem on channel 20, the station's transitional DTV channel.

66697, but at a higher ERP of 350 kW would still not cause 0.1% or greater interference to any co-channel or adjacent channel facilities[9] as listed in the DTV Table of Allotments adopted. The areas and populations served are summarized below:

Facility	ERP	Site	Area (sq. km.)	Population
WOTF-TV	5000 kW	Bithlo	22,496	2,569,810
DTV Table	1000 kW	St. Cloud	23,789	2,340,000
Proposed WOTF-DT	200 kW	Bithlo	23,591	2,602,182

The instant 200 kW ERP proposal has a total service area virtually identical in size and population to that of the DTV Table facility, while also significantly reducing the power needed to achieve that result. While the population of the proposed DTV facility is 11% above that of the DTV Table facility, that is necessary to prevent loss of service to analog viewers. The increase above the licensed analog facility's Grade B coverage is only 1.3%.[10]

Accordingly, it can be concluded that substitution of the presently-licensed antenna and transmitter site, at an ERP of 200 kW, for the abandoned construction permit facility at another site specified by the FCC, can be made without any adverse impact on any station and ensures that present WOTF-TV viewers will not lose service when post-transition DTV facilities are implemented.

D. KWEX-DT San Antonio, TX

KWEX-DT was assigned its elected channel 41, the present analog channel of KWEX-TV, at an ERP of 416 kW, antenna HAAT of 414 meters, and with a directional antenna having FCC ID 74547.

In certifying facilities for the purpose of the DTV channel election process, KWEX-TV specified its now-licensed, "maximized" channel 39 DTV facility. The radiation characteristic set forth for FCC pattern ID 74547 matches that of the licensed KWEX-DT facility, FCC ID 40108. However, because the present DTV antenna is a slotted coaxial type that is not of broadband design, it cannot be used on channel 41. KWEX-DT must either utilize the existing KWEX-TV

[9] Specifically, no interference to stations WXPX-DT on channel 42 at Bradenton, FL, WJXT-DT on channel 42 and WJEB-DT on channel 44 at Jacksonville, FL, WSWG-DT on channel 43 at Valdosta, GA, and 0.05% to WTOG-DT on channel 44 at St. Petersburg, FL.

[10] This results primarily from the difference between the F{50,90} and F{50,50} propagation curves.

antenna, pattern ID 17385, or have a new channel 41 antenna built to match FCC pattern, ID 74547.

The existing tower is fully loaded and not capable of supporting an additional antenna. Were KWEX-DT to utilize the current KWEX-TV antenna but be constrained by the ERPs in specific directions that result from pattern ID 74547 (in order to maintain its coverage contour within the allotted bounds under the proposed "freeze" continuation), the station would be limited to an ERP of only 235 kW (a decrease of 43½%). The present DTV antenna cannot be removed prior to the end of the transition without impacting both KWEX-DT and KVDA-DT, which share this antenna.

By the instant Petition for Reconsideration, KWEX-DT seeks substitution of its licensed analog antenna pattern, ID 17385, in lieu of that generated by the FCC staff, ID 74547, at a HAAT of 432 m and ERP of 382 kW.[11]

A study of the interference impact of using the existing KWEX-TV antenna was performed on this date by the consulting engineering firm of duTriel, Lundin, & Rackley. Their analysis revealed that the proposed operation of KWEX-DT with the existing KWEX-TV antenna would not cause 0.1% or greater interference to any first-adjacent or co-channel station.[12] The interference-free area and population served would be increased by 2.1% and 0.1%, respectively.

Accordingly, it can be concluded that substitution of the presently-licensed antenna for the antenna specified by the FCC staff will ensure that present KWEX-DT viewers will not lose service when post-transition DTV facilities are implemented and no impermissible interference will result to any other DTV allotments.

E. KUTH Provo, UT

KUTH-DT was assigned its elected channel 32, the present analog channel of KUTH-TV, at an ERP of 138 kW, antenna HAAT of 812 meters, and a directional antenna bearing FCC identification (ID) 75067.

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[11] ERP was adjusted downward slightly from the DTV Table value due to the small increase of HAAT inherent in the existing antenna's elevation.

[12] Specifically, the proposal would cause 0.001% interference to KAZH-DT on channel 41 at Baytown, TX, and no interference whatsoever to KXAS-DT on channel 41 at Fort Worth, TX.

KUTH-TV is an analog "singleton" with no paired DTV channel. Consequently, the FCC staff derived a directional antenna pattern for prospective channel 32 DTV operation based on matching the predicted channel 32 F{50,90} noise-limited coverage contour for DTV operation to the F{50,50} Grade B contour of KUTH-TV. Because of differences between these propagation curves, the directional radiating characteristic derived does not match that of the existing antenna. The post-transition DTV facility must either utilize the existing KUTH-TV antenna, FCC pattern ID 67453, or have a new channel 32 antenna built to match the FCC hypothetical pattern. It is believed that the sharp changes in relative field of the FCC pattern[13] cannot be realized with any practical antenna.

Were the station to utilize the current KUTH-TV antenna for post-transition DTV operation but be constrained by the ERPs in specific directions that result from FCC pattern ID 75067 (in order to maintain its coverage contour within the allotted bounds under the proposed "freeze" continuation), the station would be limited to an ERP of only 50.6 kW (a decrease of 63%). The station appears to be faced with the choice of procuring an antenna to meet a specification that is unlikely to be realized[14], or taking an extreme reduction in ERP that causes loss of service, in order to use its existing antenna.

By the instant Petition for Reconsideration, KUTH seeks substitution of its licensed analog antenna pattern, ID 67453, in lieu of that generated by the FCC staff, ID 75067.

A study by the consulting engineering firm of duTreil, Lundin, & Rackley, commissioned by Univision during the preparation of its comments in the 07-91 NPRM, established that post-transition channel 32 DTV operation of KUTH, at the allotted ERP and HAAT, but with antenna pattern ID 67453, would not cause 0.1% or greater interference to any co-channel or adjacent channel facilities[15] as listed in the DTV Table of Allotments as adopted. This proposal increases the area served by 2.2%, with a service population change below 0.1%, both with respect to the data shown in the DTV Table.

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[13] This hypothetical pattern has a nearly rectangular shape, with dramatic changes in radiation versus angle slopes at 170° and 330° East of True North that cannot be realized with any reasonably practical antenna.

[14] Procurement of such an antenna, if at all possible, would also increase demands on scarce nationwide antenna design, manufacturing, and installation resources.

[15] Specifically, station KIDA-DT on channel 32 at Sun Valley, ID.

Accordingly, it can be concluded that substitution of the presently-licensed antenna for the hypothetical antenna generated by the FCC staff can be made without any adverse impact on any station and ensures that present KUTH-TV viewers will not lose service when post-transition DTV facilities are implemented.

F. WSUR-DT Ponce, PR

WSUR-DT was assigned its elected channel 9, the present analog channel of WSUR-TV, at an ERP of 3.2 kW, antenna HAAT of 825 meters, and a directional antenna bearing FCC identification (ID) 74569.

WSUR-DT operates on channel 43. The prior licensee erroneously certified its existing DTV coverage for the election process in November 2004. The FCC staff subsequently derived hypothetical directional antenna pattern ID 74569 by matching the high-VHF noise-limited contour to that of the existing UHF DTV facility. The post-transition DTV facility must either utilize the existing, non-directional WSUR-TV antenna, or have a new channel 9 antenna built to match the FCC hypothetical pattern. It is believed that the deep pattern minima and rapid changes in relative field of the FCC pattern cannot be realized with any practical antenna on high VHF channels.

The existing WSUR-TV tower does not have aperture available to support both the existing analog non-directional channel 9 antenna and a highly customized directional antenna for post-transition use. Were the station to utilize the current WSUR-TV antenna for post-transition DTV operation but be constrained by the ERPs in specific directions that result from FCC pattern ID 74569 (in order to maintain its coverage contour within the allotted bounds under the proposed "freeze" continuation), the station would be limited to an ERP of only 71 W (a decrease of 98%). The station appears to be faced with the choice of procuring an antenna to meet a specification that is unlikely to be realized, or taking an extreme reduction in ERP that causes loss of service, in order to use its existing antenna.

By the instant Petition for Reconsideration, WSUR-DT seeks substitution of its licensed non-directional analog antenna, in lieu of that generated by the FCC staff, ID 74569, at an

ERP of 10.5 kW and HAAT of 857 meters. This ERP value matches the noise-free DTV coverage contour for post-transition operation to the Grade B contour of the licensed WSUR-TV facility.

There are no channel 8, 9, or 10 stations within the Commonwealth of Puerto Rico except WSUR-TV. Consequently, no interference analysis is necessary. A study by the consulting engineering firm of duTreil, Lundin, & Rackley today, commissioned by Univision, determined that the interference-free area served would be increased by 56%[16] and the population served would be increased by 6.5%, both with respect to DTV Table data. Figure 2 illustrates the present analog Grade B and proposed noise-free DTV service contours.

Accordingly, it can be concluded that substitution of the presently-licensed antenna for the hypothetical antenna generated by the FCC staff can be made without any adverse impact on any station and ensures that present WSUR-TV viewers will not lose service when post-transition DTV facilities are implemented.

G. Conclusion

The facilities specifications set forth herein can be adopted without causing impermissible interference to any other DTV Table of Allotments facilities, will ensure maintenance of service at the end of the DTV transition, lessen the need for the design, manufacture, and installation of customized antennas, and permit these stations to efficiently implement post-transition operations without consideration of waiver requests and the performance of interference analyses by the FCC staff at the application stage.

26 October 2007

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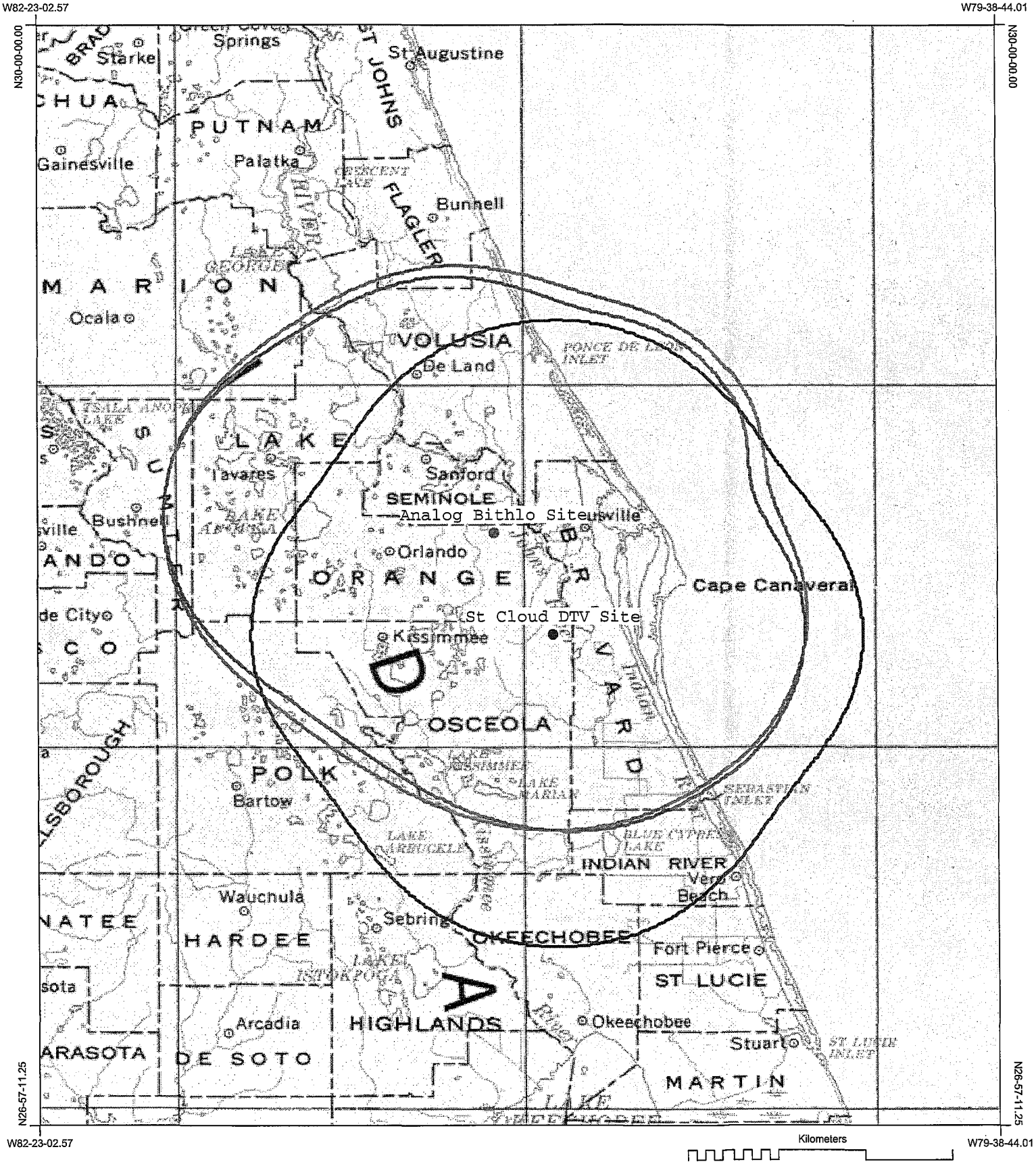
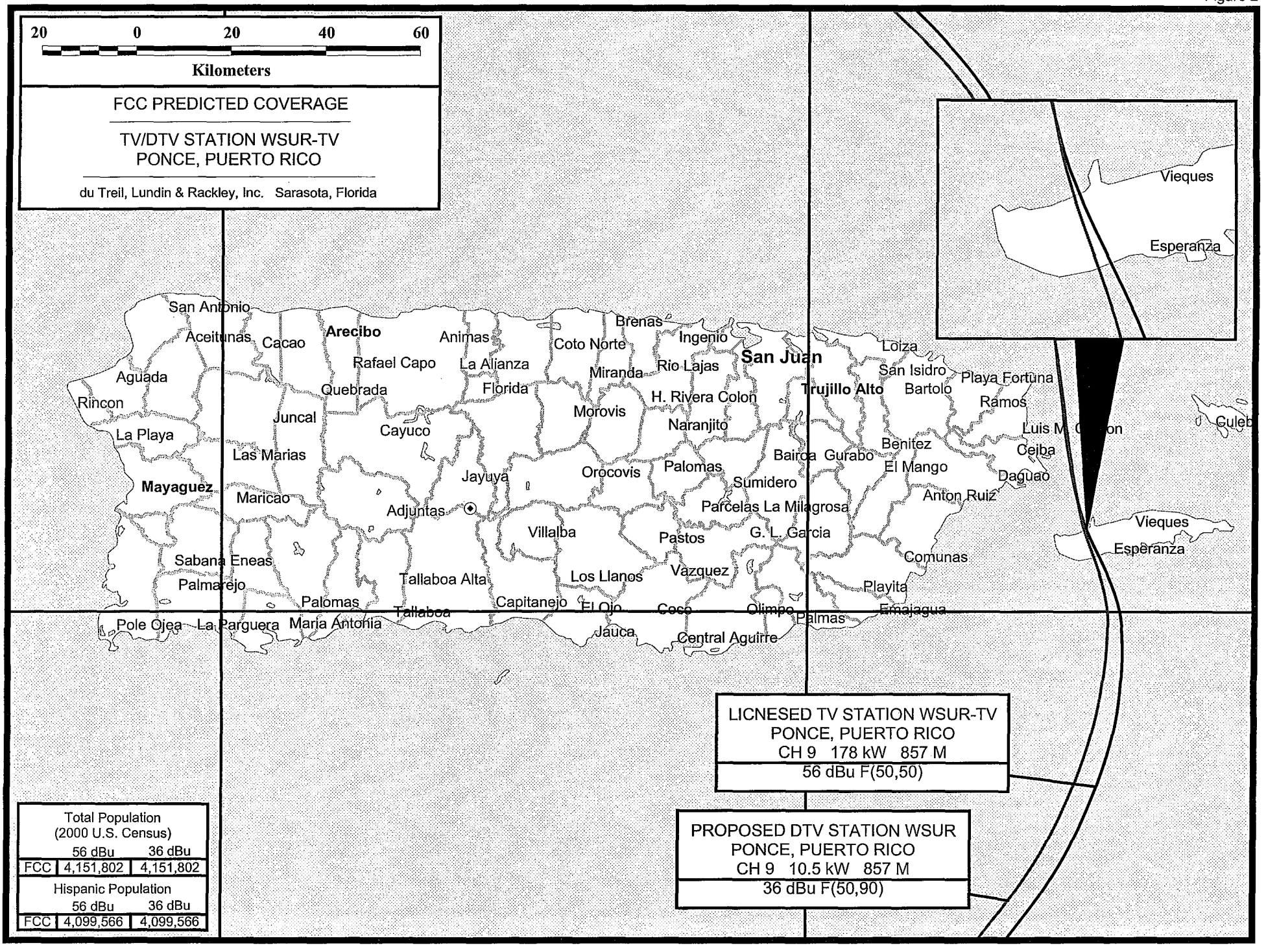
[16] This results solely from the OET-69 analysis including coverage over sea water. The increase in land area coverage is far less.

Figure 1 - WOTF Coverage Comparison



Legend:
Green = WOTF-TV Licensed Grade B
Blue = WOTF-DT FCC DTV Table Noise-Limited
Red = WOTF-DT 200 kW Noise-Limited at WOTF-TV Site

Figure 2


20 0 20 40 60
Kilometers
FCC PREDICTED COVERAGE
TV/DTV STATION WSUR-TV
PONCE, PUERTO RICO
du Treil, Lundin & Rackley, Inc. Sarasota, Florida
Vieques
Esperanza
San Antonio
Aceitunas
Cacao
Arecibo
Animas
Brenas
Coto Norte
Ingenio
San Juan
Loiza
Rafael Capo
La Alianza
Miranda
Rio Lajas
San Isidro
Playa Fortuna
Aguada
Quebrada
Florida
Trujillo Alto
Bartolo
Rincon
H. Rivera Colon
Ramos
Juncal
Morovis
Naranjito
Luis M. Culebra
La Playa
Cayuco
Benitez
Las Marias
Bairoa
Gurabo
Ceiba
Palomas
El Mango
Jayuya
Orocovis
Daguao
Mayaguez
Sumidero
Maricao
Anton Ruiz
Parcelas La Milagrosa
Adjuntas
Villalba
G. L. Garcia
Pastos
Sabana Eneas
Comunas
Vazquez
Palmarejo
Tallaboa Alta
Los Llanos
Playita
Palomas
Capitanejo
El Ojo
Coco
Olimpo
Emajagua
Tallaboa
Palmas
Pole Ojea
La Parguera
Maria Antonia
Jauca
Central Aguirre
LICNESED TV STATION WSUR-TV
PONCE, PUERTO RICO
CH 9 178 kW 857 M
56 dBu F(50,50)
PROPOSED DTV STATION WSUR
PONCE, PUERTO RICO
CH 9 10.5 kW 857 M
36 dBu F(50,90)
Total Population
(2000 U.S. Census)
56 dBu 36 dBu
FCC 4,151,802 4,151,802
Hispanic Population
56 dBu 36 dBu
FCC 4,099,566 4,099,566